

Appendix B
Request for Documents to Dr. Kiran Dasari

Defendants 3M Company and Arizant Healthcare, Inc. request that the documents in your possession, custody or control described below be produced by you.

Documents To Be Produced

Author's Background

1. Any curriculum vitae or resume produced by you since 2012.

Documents Relating to Study Initiation and Protocols, Procedures and Methods

2. Communications between you, Mark Albrecht and Mark Harper regarding the design of the article titled "Effect of forced-air warming on the performance of operating theatre laminar flow ventilation," published in *Anaesthesia* 2012, 76, 244-249 (referred to as "Dasari 2012" or "the Study"), on the subject of the design of the Study.
3. Communications between you and Dr. Scott Augustine regarding the subject of the design of the Study.
4. Communications between and among you and Augustine Temperature Management¹ regarding the design of the Study.
5. Communications between you and Dr. Scott Augustine regarding the funding for the Study.
6. Communications between and among you and Augustine Temperature Management regarding the subject of funding for the study
7. Records or registers of consulting fees, expense reimbursement, and other compensation paid to you by Dr. Scott Augustine for your work on the Study.
8. Records or registers of consulting fees, expense reimbursement, and other compensation paid to you by Augustine Temperature Management for your work on the Study.
9. Agreements between you and Dr. Scott Augustine for your work on the Study.
10. Agreements between you and Augustine Temperature Management for your work on the Study.
11. Communications between you and the Royal Sussex County Hospital, before the Study was conducted, about the Study.

¹ In the "Competing Interests" section of Dasari 2012, reference is made to "Augustine Temperature Management." That term is used in this document. That term also should be read to include also "August Temperature Management LLC," to the extent this is a different corporate entity.

12. Documents evidencing consent by the Royal Sussex County Hospital about the Study.
13. Communications between you and the Royal Sussex County Hospital, after the Study was conducted, about the Study results.
14. Specifications for the partial-walled ultra-clean operating theatre used in the Study.
15. Model and serial numbers for the Bair Hugger patient warming device used in the Study.
16. Model and serial numbers for the Hot Dog patient warming device used in the Study.
17. Model and serial numbers for the Inditherm patient warming device used in the Study.
18. Instructions for use of the thermistors (KIMO KH200 Temperature and Humidity Loggers) used in the Study.
19. Evidence of the protocol for placement of the thermistors.
20. Protocol for taking and recording temperature measurements.
21. Statistical Analysis Plan for the Study, including the ANOVA models fitted with the data from the Study.
22. Evidence of the final protocols for the Study.
23. Communications between and among you, Mark Albrecht and Mark Harper on the subject obtaining forced air warming devices for the study described in the study.

Data and Results of the Study

24. All data generated during the implementation of the Study.
25. Records reflecting all measurements taken during the Study, including during set-up.
26. All graphic representations generated using data from the Study.
27. All results from the statistical analysis of raw data from the Study.
28. All photographs taken during the implementation of the Study, including during set-up.
29. All video or audio recordings made during the implementation of the Study, including during set-up.
30. Communications between and among you, Mark Albrecht and Mark Harper regarding the results of the Study.
31. Communications between you and Dr. Scott Augustine regarding the results of the Study;

- 32. Communications between you and Augustine Temperature Management regarding the results of the Study.
- 33. Communications between and among you and Dr. Scott Augustine regarding raw data for the Study.
- 34. Communications between you and Augustine Temperature Management regarding raw data for the Study.
- 35. Communications between you and Dr. Scott Augustine regarding the analysis or interpretation of the Study results.
- 36. Communications between you and Augustine Temperature Management regarding the analysis or interpretation of the Study results.

Study Publication

- 37. All pre-publication drafts of the manuscript that was published as Dasari 2012.
- 38. Communications between and among you, Mark Albrecht and Mark Harper regarding Dasari 2012, including the writing of the article.
- 39. Communications between you and Dr. Scott Augustine regarding Dasari 2012, including the writing of the article.
- 40. Communications between you and Augustine Temperature Management regarding Dasari 2012, including the writing of the article.
- 41. Correspondence between you and representatives of the journal Anaesthesia regarding the Study or Dasari 2012.
- 42. All communications from reviewers of Dasari 2012.

Communications with Counsel

- 43. Communications or correspondence between you and any lawyer or solicitor representing the Defendants in connection with the subject litigation pending in the United States.
- 44. Communications or correspondence between you and any lawyer or solicitor representing any plaintiff in connection with the subject litigation pending in the United States.